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Attorneys for Plaintiff
STOP Franchising SPE LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

STOP FRANCHISING SPE LLC, a
Delaware limited liability company,

Plaintiff,

vs.

MICHAEL MENDOZA, INC, a Nevada
corporation; MICHAEL MENDOZA, an
individual, and DOES 1 THROUGH 10,

Defendants.

Case No.2:22-CV-01471-GMN-BNW

**STIPULATION AND ORDER TO EXTEND
DEADLINE FOR PLAINTIFF TO
RESPOND TO ANSWER AND
COUNTERCLAIMS [ECF No. 31]**

(FIRST REQUEST)

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiff STOP FRANCHISING SPE LLC ("Plaintiff"), along with Defendant and Counterclaimant MICHAEL MENDOZA, INC. ("MMI") and Defendant MICHAEL MENDOZA (the "Mendoza Parties") (collectively, the "Parties"), by and through their undersigned counsel of record, for good cause shown, hereby stipulate and agree as follows:

WHEREAS, Plaintiff initiated this action on September 8, 2022 (ECF No. 1);

WHEREAS, Plaintiff filed a First Amended Complaint on October 10, 2022 (ECF No. 23);

WHEREAS, on October 24, 2022, the Mendoza Parties filed an Answer to the First Amended Complaint, and MMI filed Counterclaims (ECF No. 31);

WHEREAS, the Parties are actively meeting and conferring about Plaintiff's alleged potential deficiencies with the Answer and Counterclaims, including Plaintiff's contemplated motion to strike and motion to dismiss;

WHEREAS, the Parties agree that they need additional time to meet and confer about these issues in order to potentially obviate the need for motion practice;

WHEREAS, the Parties agree that Plaintiff's deadline to respond to the Answer and Counterclaims shall be extended from November 14, 2022 to and including December 12, 2022 in order to accommodate these meet and confer efforts;

WHEREAS, good cause exists for this extension in order to allow the Parties to continue to meet and confer and evaluate whether or not an amended Answer and/or Counterclaims will be filed or if there is an agreement that can be reached that would obviate the need for motion practice;

WHEREAS, this stipulation is not sought for the purposes of delay;

WHEREAS, this is the first such stipulation for an extension of time;

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1 THEREFORE, the Parties stipulate that Plaintiff's response to the Answer and
2 Counterclaims, whether by answer, motion or otherwise, is due on or before December 12, 2022.

3 **IT IS SO STIPULATED.**

4 DATED: November 9, 2022

McDONALD CARANO LLP

5 By: /s/ Kiley A. Harrison

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9 Attorneys for Plaintiff

10 STOP FRANCHISING SPE LLC.

11
12 DATED: November 9, 2022

WILEY PETERSEN

13 By: /s/ Jonathan Blum

Jonathan Blum (NSBN 9515)

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16 Attorneys for Defendants and

17 Counterclaimant

MICHAEL MENDOZA, INC. and

18 MICHAEL MENDOZA

19
20 **IT IS SO ORDERED.**

21
22 

23 UNITED STATES MAGISTRATE JUDGE

24 DATED: November 10, 2022

CERTIFICATE OF SERVICE

I certify that I am an employee of McDonald Carano LLP and that on the 9th day of November, 2022, a true and correct copy of the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFF TO RESPOND TO ANSWER AND COUNTERCLAIMS [ECF No. 31]** was electronically filed with the Clerk of Court by using the CM/ECF service which will provide copies to all counsel of record registered to receive CM/ECF notification.

/s/ Jelena Jovanovic

Jelena Jovanovic